

FEE

DP Bar Code No. 389909 File Symbol No. / Reg. No : 85678-10 Decision No. 448626.
PC Code 074801

DATE: 07/14/11

SUBJECT: Product Chemistry Review of "TRIBUFOS TECHNICAL"

FROM: Indira Gairola
Product Chemistry Team
Technical Review Branch/RD (7505P)

TO: Mindy Ondish / Kable Davis / Tony Kish PM 25
Herbicide Branch /Registration Division (7505P)

DP BARCODE: 389909
DECISION No.: 448626
REGISTRATION NO./FILE SYMBOL NO.: 85678-10
PRODUCT NAME: TRIBUFOS TECHNICAL
PC CODE: 074801
REGISTRANT: Redeagle International, LLC
USE: Herbicide
FOOD USE: Yes [X] No []
MRID Numbers: 484722-01

INTRODUCTION:

The registrant is seeking approval of an alternate formulation using an unregistered source of active ingredient (Tribuphos Technical). The new source of Tribuphos Technical (99.58%) will be produced in [REDACTED]

SUMMARY OF FINDINGS:

1. Basic & Alternate CSFs do not contain the same impurities, there is considerable difference in impurity profile of two CSFs..
2. Applicant has submitted the details regarding the difference in both the CSFs, TRB would like to forward the issue to HED for further scrutiny.
3. A comparative Table on impurity profile along with proposed alternate CSF and cited Basic CSF has been included for HED to determine if these impurities are of toxicological concern and offer any suggestions/comments.

Product Ingredient Source Information May Be Entitled to Confidential Treatment

CONCLUSIONS:

The TRB has reviewed the product chemistry data submitted for Chlorpropham TGA1 (produced by Pace International, LLC) and has concluded that:

TRB is forwarding this submission to HED for final decision. Please see items 1-3 in summary of findings..

